

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD  
BRIGGS; RAJ LEE; MICHAEL  
CAMERON; MATTHEW  
SAUNDERS, individually and on  
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his  
official capacity as Sheriff of Oakland  
County; CURTIS D. CHILDS, in his  
official capacity as Commander of  
Corrective Services; OAKLAND  
COUNTY, MICHIGAN,

Defendants.

POTTER, DeAGOSTINO, O'DEA & CLARK

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**DEFENDANTS' EXHIBIT LIST**

NOW COME Defendants, MICHAEL BOUCHARD, CURTIS D. CHILDS  
and OAKLAND COUNTY, by and through their attorneys, POTTER  
DeAGOSTINO O'DEA & CLARK, hereby lists the following exhibits that may  
be used at the time of trial in this matter:

POTTER, DeAGOSTINO, O'DEA & CLARK

- A. Time-line/PowerPoint of actions taken by Oakland County Jail in response to COVID-19
- B. Chart depicting total population reduction by day and daily swabs per day, including underlying back up data
- C. Housing List Occupancy for May 1st 2020 divided by cell, including underlying back up data
- D. Court documents for *People v. Michael Doyle*, Oakland County Circuit Court Case No. 2019-272793-FH regarding request for early release
- E. Court documents for *People v. James Webb*, 52-3 District Court Case No. 15-001821-ST regarding request for early release
- F. Court documents for *People v. Jamaal Cameron*, Oakland County Circuit Court Case No. 19-272469-FH regarding request for early release
- G. Pictures of Oakland County Jail Diagrams, including close-up colorized pictures
- H. Email from Captain Childs to Vicki Warren regarding creation of additional medical priority list for potential prisoner release request dtd 04/8/20
- I. Quotation for 5,000 cotton masks requested by OCJ
- J. Memo created by Captain Childs that was posted in OCJ with COVID-19 information
- K. Course Complete History for Oakland County Sheriff's Office/Oakland County Jail personnel regarding COVID-19 testing and illness guidance

- L. Pictures taken during Dr. Paredes' inspection of OCJ
- M. Jamaal Cameron's Medical Prescreening
- N. Email from Captain Childs to Jennifer Brantley dtd 03/26/20
- O. Email from Captain Childs to Dale Miller dtd 03/27/20
- P. Jamaal Cameron's original Medical Prescreening
- Q. Inmate refusal letters for COVID-19 swab
- R. Audio recordings from Dr. Paredes' inspection (not admitted during trial, marked for Appellate Record)

POTTER, DeAGOSTINO, O'DEA & CLARK

Dated: May 8, 2020

POTTER, DeAGOSTINO, O'DEA & CLARK  
/s/ STEVEN M. POTTER (P33344)  
Attorneys for Defendants  
2701 Cambridge Court, Suite 223  
Auburn Hills, Michigan 48326  
(248) 377-1700  
[spotter@potterlaw.com](mailto:spotter@potterlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all participating attorneys.

/s/ STEVEN M. POTTER (P33344)  
Attorney for Defendants  
2701 Cambridge Court, Suite 223  
Auburn Hills; Michigan 48326  
(248) 377-1700  
[spotter@potterlaw.com](mailto:spotter@potterlaw.com)